Federal Defenders OF NEW YORK, INC.

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Southern District of New York Jennifer L. Brown Attorney-in-Charge

VIA ECF

Honorable Judge Victor Marrero United States District Judge Southern District of New York United States Courthouse 500 Pearl Street New York, NY 10007

Re: <u>United States v. Noam Halpert</u> 17 Cr. 447 (VM)

Dear Judge Marrero:

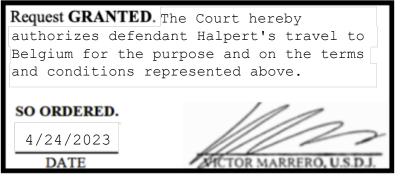
April 21, 2023

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I write on behalf of my client Noam Halpert to respectfully request that the Court modify Mr. Halpert's travel restrictions on his bond to allow him to travel to Belgium with his family from April 28, 2023 through May 3, 2023. I have spoken with AUSA Matthew Podolsky as well as Pretrial Services Officer Shannon Finneran regarding this request – they take no position as to this request.

Mr. Halpert has remained on pretrial supervision since his arrest in 2017. Over the past five years, Mr. Halpert has remained complaint with the terms of his supervised release and has previously traveled internationally on more than one occasion without issue. Given Mr. Halpert's history of compliance and successful international travel while under pretrial supervision, the defense requests that Mr. Halpert be afforded permission to travel to Belgium with his family.

Thank you for your consideration of this request.



Respectfully submitted,

/s/ Marisa K. Cabrera Assistant Federal Defender Tel.: (212) 417-8730